

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

RECEIVED

Nov 26 2 16 PM '01

Postal Rate and Fee Changes, 2001

POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY  
Docket No. R2001-1

**NEWSPAPER ASSOCIATION OF AMERICA  
FOURTH SET OF INTERROGATORIES TO  
UNITED STATES POSTAL SERVICE WITNESS LARAINÉ HOPE  
(NAA/USPS-T31-22-24)**

November 26, 2001

The Newspaper Association of America hereby submits the attached interrogatories to United States Postal Service witness Laraine Hope (USPS-T-31) and respectfully requests a timely and full response under oath.

Respectfully submitted,

NEWSPAPER ASSOCIATION OF AMERICA

Robert J. Brinkmann  
Vice President and Counsel  
Postal and Regulatory Affairs  
NEWSPAPER ASSOCIATION OF AMERICA  
529 14th Street, N.W.  
Suite 440  
Washington, D.C.  
(202) 638-4792

By: William B. Baker  
William B. Baker  
WILEY REIN & FIELDING LLP  
1776 K Street, N.W.  
Washington, DC 20006-2304  
(202) 719-7255

**CERTIFICATE OF SERVICE**

I hereby certify that I have this date served the instant document on all participants requesting such service in this proceeding in accordance with section 12 of the Rules of Practice.

November 26, 2001

William B. Baker  
William B. Baker

NEWSPAPER ASSOCIATION OF AMERICA  
FOURTH SET OF INTERROGATORIES TO  
UNITED STATES POSTAL SERVICE WITNESS LARAINÉ HOPE  
(NAA/USPS-T31-22-24)

NAA/USPS-T31-22: Please refer to Domestic Mail Manual E630.1.7(c), which states, in pertinent part, the density required for the Standard ECR saturation rate as follows: "pieces must be addressed either to 90% or more of the active residential addresses or to 75% or more of the total number of active possible delivery addresses, which is less, on each carrier route receiving this mail." Please also assume that, in the scenarios below, the mailing would otherwise qualify in all respects for Standard ECR rates.

a. Please confirm that, assuming a route consisting only of 500 active residential addresses, a mailing consisting of 375 pieces could qualify for the Standard ECR saturation rate.

b. Please confirm that, assuming a route consisting only of 500 active residential addresses, a mailing consisting of 374 pieces would not qualify for the Standard ECR saturation rate.

c. Please confirm that, assuming a route consisting only of 500 active residential addresses, a mailing consisting of 250 pieces would not qualify for the Standard ECR saturation rate.

d. Please confirm that, assuming a route consisting of 500 active possible delivery addresses, of which only 250 were active residential addresses, a mailing addressed to 225 residential addresses could qualify for the Standard ECR saturation rate.

e. Please confirm that nothing in the DMM would require, in the scenario in (d), that the 250 residential addresses would have to be in any particular section of the route, but could be scattered throughout the entire route.

f. If you cannot confirm any of the above, please explain why not.

NEWSPAPER ASSOCIATION OF AMERICA  
FOURTH SET OF INTERROGATORIES TO  
UNITED STATES POSTAL SERVICE WITNESS LARAINÉ HOPE  
(NAA/USPS-T31-22-24)

NAA/USPS-T31-23: Please refer to your response to NAA/USPS-T31-2.

- a. Please confirm that your methodology assumes that the proportion of commercial ECR and NECR costs remains constant between the base year and the Test Year. If you cannot confirm, please explain why not.
- b. Please confirm that the ratio of commercial ECR to NECR volumes is not constant between the Base Year levels and the forecasted Test Year volumes, as presented in LR-J-125. If you cannot confirm, please explain why not.
- c. Please confirm that the mix among rate categories in commercial ECR and NECR does not remain constant between the Base Year levels and the forecasted Test Year volumes, as presented in LR-J-125. If you cannot confirm, please explain why not.
- d. Please explain why you assume a constant cost ratio between commercial ECR and NECR when the ratio of the volumes of these two subclasses, and the mail mix within the subclasses, is not constant between the Base Year and Test Year.

NAA/USPS-T31-24: Please refer to your responses to NAA/USPS-T31-6 and 7.

Can you also confirm that the postage rate is one factor that a newspaper mailing a Total Market Coverage program takes into account in setting its price to advertisers. Please explain any negative response.